

IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA  
SOUTHERN DIVISION

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Eva Williams,  
Plaintiff,

v.

Greater Georgia Life,  
Insurance Company,  
Atlanta Disability Service Center,  
Defendant.

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CASE NO: 1:06cv387-CSC

**COMPLAINT**

1. Defendant is a corporation engaged in the business of issuing insurance policies.
2. The Defendant issued to the Plaintiff's employer, West Point Home, Inc., a policy of group Short-Term Disability insurance, in which Plaintiff is a participant.
3. Said policy is an employee benefit plan that is regulated by the Employee Retirement Income Security Act (hereinafter called "E.R.I.S.A."), 29 U.S.C. Section 1001 et seq.
4. This action seeks to recover benefits due to Plaintiff under the terms of said policy or plan and seeks to enforce Plaintiff's rights under the terms of said policy or plan and seeks to clarify Plaintiff's rights to future benefits under the terms of said policy or plan.
5. This Court has jurisdiction over this action pursuant to 29 U.S.C. Section 1132 (e).
6. On or about the 28<sup>th</sup> day of July 2005, Plaintiff filed a claim with Defendant, seeking benefits under said policy or plan.
7. Defendant wrongfully denied said claim.
8. Plaintiff continues to be eligible for present and future benefits under said policy or plan, and the Defendant has wrongfully denied Plaintiff's claim for the same.

WHEREFORE, the Plaintiff prays the Court as follows:

(1) for a judgment against the Defendant in the sum of all the claims for past benefits wrongfully withheld from Plaintiff by Defendant; and for a judgment against Defendant ordering Defendant to pay all similar claims of the Plaintiff in the future; and

(2) for an award of attorney's fees pursuant to 29 U.S.C. Section 1132 (g); and

(3) for such other, further, or different relief as may be just and proper.

Respectfully submitted this 31<sup>st</sup> day of April, 2006.

A handwritten signature in black ink, appearing to read 'S. L. Adams', is written over a horizontal line.

Samuel L. Adams (ADA017)

Attorney for Plaintiff

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